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8 *Trustee*

9 **UNITED STATES BANKRUPTCY COURT**  
10 **EASTERN DISTRICT OF WASHINGTON**

11 In re:

12 GIGA WATT, Inc., a Washington  
13 corporation,

14 Debtor.

Case No. 18-03197 FPC 7

The Honorable Frederick P. Corbit

Chapter 7

**CHAPTER 7 TRUSTEE'S MOTION  
FOR ORDER APPROVING  
SETTLEMENT AGREEMENT (RI  
LANDLORD)**

15 Mark D. Waldron, in his official capacity as the Chapter 7 Trustee (the  
16 "Trustee"), hereby moves (the "Motion") the Court pursuant to 11 U.S.C. § 363,  
17 Fed. R Bankr. Proc. 9019 and LBR 9019-1 for an Order, as proposed in **Exhibit A**  
18 attached hereto, approving that certain *Settlement of Administrative Claim* (the  
19 "Agreement"), a copy of which is attached hereto as **Exhibit B**.

20 This Motion is supported by the *Memorandum of Points and Authorities in*  
21 *Support of the Chapter 7 Trustee's Motion for Order Approving Settlement*  
22 *Agreement (RI Landlord)* ("Memorandum") and the *Declaration of Mark D.*  
23 *Waldron in Support of the Chapter 7 Trustee's Motion for Order Approving*  
24 *Settlement Agreement (RI Landlord)*, filed herewith.

25 Ch. 7 Trustee's Motion for Order  
Approving Settlement Agreement  
(RI Landlord) - Page 1

1 As set forth in the Memorandum filed herewith and subject to the Court's  
2 approval, the Agreement resolves the administrative claims of the TNT Business  
3 Complexes, LLC (the "RI Landlord") in which they asserted the right to pay of  
4 \$83,250 on an administrative basis for post-petition, pre-conversion rent, fees and  
5 damages allegedly arising from the Debtor's lease of a warehouse from the RI  
6 Landlord. The warehouse is located in Rock Island, Douglas County, Washington.  
7 Pursuant to the Agreement, the RI Landlord will have one administrative claim in  
8 the amount of \$65,400. Payment of this settled administrative claim would be  
9 subject to further Court order. The Agreement also provides for mutual releases of  
10 all issues related to the RI Lease.

11 WHEREFORE, the Trustee respectfully requests entry of an Order:

- 12 1. Granting the Motion;  
13 2. Approving the Agreement; and,  
14 3. Granting such other and further relief as the Court deems necessary  
15 and just.

16 Dated: February 8, 2021

POTOMAC LAW GROUP PLLC

17  
18 By: /s/ Pamela M. Egan  
Pamela M. Egan (WSBA No. 54736)

19 *Attorneys for Mark D. Waldron, Chapter 7*  
20 *Trustee*

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23 Ch. 7 Trustee's Motion for Order  
24 Approving Settlement Agreement  
(RI Landlord) - Page 2